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March 12, 2025

VIA ECF

Hon. Arun Subramanian
U.S. District Judge
United States District Court for the Southern District of New York
500 Pearl St.
New York, NY 10007

Re: Egbufor v. Boyd, et al., No. 24-cv-09779-AS

Dear Judge Subramanian:

We represent Defendants Carolyn Boyd, Rick Criswell, Jonathan Hochwald, Arthur Karpati, Emulsive Productions, LLC and PDNYC, LLC (collectively, "Defendants") in the above-referenced matter. In accordance with Rules 3(c) and 7 of Your Honor's Individual Practices in Civil Pro Se Cases, we submit this letter motion to respectfully request a temporary stay of discovery and an adjournment of the initial case management conference presently scheduled in this matter for March 20, 2025. This is Defendants' first request for a stay of discovery and adjournment of the initial case management conference. Plaintiff consents to Defendants' request to stay discovery, but does not consent to an adjournment of the initial case management conference. The parties are next scheduled to appear before the Court on March 20, 2025.

Defendants make the foregoing request because they intend to file a motion to dismiss Plaintiff's Complaint no later than March 18, 2025. Staying discovery (and adjourning the case management conference intended to discuss discovery deadlines) pending resolution of that motion will preserve the parties' and judicial resources by either: (i) obviating the need for a conference and discovery entirely; or (ii) permitting the parties to frame a discovery plan that is tailored to the claims remaining in the case, if any. In the event that any portion of Defendants' motion to dismiss is ultimately denied, Defendants propose that the parties submit a joint Proposed Case Management Plan and Discovery Order for Your Honor's review and appear for an initial case management conference following the Court's ruling on the motion.

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To the extent that Your Honor has any questions regarding the foregoing requests, we will be happy to discuss the same. Thank you for your time and attention to this matter.

Respectfully submitted,

/s/ Jonathan Stoler

Jonathan Stoler
for SHEPPARD, MULLIN, RICHTER &
HAMPTON LLP

Cc: D. Dumebi Egbufor